

ROSEMARIE T. RING (SBN 220769)  
rose.ring@mto.com  
MUNGER, TOLLES & OLSON LLP  
560 Mission Street  
Twenty-Seventh Floor  
San Francisco, California 94105-2907  
Telephone: (415) 512-4000  
Facsimile: (415) 512-4077

CHRISTINE P. SUN (SBN 218701)  
csun@aclunc.org  
ELIZABETH O. GILL (SBN 218311)  
egill@aclunc.org  
SHILPI AGARWAL (SBN 270749)  
sagarwal@aclunc.org  
AMERICAN CIVIL LIBERTIES UNION  
FOUNDATION OF NORTHERN  
CALIFORNIA, INC.  
39 Drumm Street  
San Francisco, CA 94111  
Telephone: (415) 621-2493  
Facsimile: (415) 255-8437

Attorneys for Plaintiff

CHAD A. READLER  
Acting Assistant Attorney General  
ANTHONY J. COPPOLINO  
Deputy Branch Director  
ANDREW E. CARMICHAEL  
andrew.e.carmichael@usdoj.gov  
Virginia Bar No. 76578  
Trial Attorney  
Civil Division, Federal Programs Branch  
U.S. Department of Justice  
20 Massachusetts Avenue, N.W., Rm. 7218  
Washington, D.C. 20044  
Telephone: (202) 514-3346  
Facsimile: (202) 305-2685

Attorneys for Defendant JAMES N. MATTIS

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

SERVICE WOMEN'S ACTION  
NETWORK,

Plaintiff,

vs.

JAMES N. MATTIS, Secretary of Defense,  
Defendant.

Case No. 12-CV-06005 EMC

**STIPULATION AND [PROPOSED]  
ORDER EXTENDING DEADLINE FOR  
DEFENDANT'S RESPONSE TO THE  
THIRD AMENDED COMPLAINT**

Judge: Hon. Edward M. Chen

On May 1, 2018, the Court granted Defendant, Secretary of Defense James N. Mattis's motion to dismiss Plaintiff, Service Women's Action Network's ("SWAN") Second Amended Complaint, on standing grounds. Dkt. 118. The Court gave leave to Plaintiff to file an amended complaint within four weeks of the date of the order. *Id.* at 23. On May 11, 2018, Plaintiff and Defendant stipulated that the May 29, 2018 filing deadline for the filing of an amended complaint be extended by thirty days, to June 28, 2018. Dkt. 119. The Court accepted the parties' stipulation on May 16, 2018. Dkt. 120. On June 28, 2018, Plaintiff filed their Third Amended Complaint. Dkt. 122. The Third Amended Complaint raises new allegations as to standing not previously addressed in the parties' briefing on the Second Amended Complaint. As such, counsel for both parties have conferred and agreed upon a proposed schedule for Defendant to respond to Plaintiff's Third Amended Complaint. The following schedule also reflects previously scheduled vacation plans and briefing deadlines in other litigation matters for counsel for both parties.

<b><u>Filing</u></b>	<b><u>Due Date</u></b>
Defendant's deadline to file a Motion to Dismiss or otherwise respond to Plaintiff's Third Amended Complaint	August 6, 2018
Plaintiff's deadline to file their opposition brief to a Motion to Dismiss the Third Amended Complaint	August 28, 2018
Defendant's deadline to file its reply brief	September 13, 2018
Proposed hearing on Defendant's Motion <sup>1</sup>	September 27, 2018

<sup>1</sup> The parties also propose moving the Further Case Management Conference currently scheduled for August 9, 2018 to September 27, 2018 and the deadline to file the Case Management Statement from August 2, 2018 to September 20, 2018.

1 DATED: July 3, 2018

MUNGER, TOLLES & OLSON LLP

2  
3 By: /s/ Steven M. Perry  
STEVEN M. PERRY

4  
5 Attorneys for Plaintiff  
SERVICE WOMEN'S ACTION NETWORK

6  
7 DATED: July 3, 2018

8 CHAD A. READLER  
Acting Assistant Attorney General  
ANTHONY J. COPPOLINO  
Deputy Branch Director  
9 ANDREW E. CARMICHAEL

10  
11 By: /s/ Andrew E. Carmichael  
ANDREW E. CARMICHAEL

12 U.S. Department of Justice  
13 Attorneys for Defendant JAMES N. MATTIS

Additional Counsel:

STEVEN M. PERRY (SBN 106154)  
MUNGER, TOLLES & OLSON LLP  
350 South Grand Avenue, 50th Floor  
Los Angeles, CA 90071  
Telephone: (213) 683-9100  
Facsimile: (213) 687-3702  
Email: *steven.perry@mto.com*

LENORA M. LAPIDUS [pro hac vice]  
AMERICAN CIVIL LIBERTIES UNION  
FOUNDATION  
WOMEN'S RIGHTS PROJECT  
125 Broad Street, 18th Floor  
New York, NY 10004  
Telephone: (212) 549-2668  
Facsimile: (212) 549-2480  
Email: *Llapidus@aclu.org*

**ATTESTATION PURSUANT TO GENERAL ORDER 45**

I, Andrew E. Carmichael, am the ECF User whose identification and password are being used to file this Stipulation and [Proposed] Order. In compliance with General Order 45.X.B, I hereby attest that all signatories have concurred in this filing.

/s/ Andrew E. Carmichael

**[PROPOSED] ORDER**

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: July <sup>16</sup>\_\_\_\_, 2018

38626519.1

